

NOTICE OF DECISION - Bureau of Mining Regulation and Reclamation

Web Posting: 10/19/2015

Deadline for Appeal: 10/29/2015

**WPC Permit No. NEV2002107
Goldwedge Mining Project
Goldwedge LLC**

The Administrator of the Nevada Division of Environmental Protection (the Division) has decided to renew Water Pollution Control Permit NEV2002107 to Goldwedge LLC. This Permit authorizes the construction, operation, and closure of approved mining facilities in Nye County, Nevada. The Division has been provided with sufficient information, in accordance with Nevada Administrative Code (NAC) 445A.350 through 445A.447, to assure that the waters of the State will not be degraded by this operation, and that public safety and health will be protected.

The Permit will become effective 3 November 2015. The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to Nevada Revised Statute (NRS) 445A.605 and NAC 445A.407. All requests for appeals must be filed by 5:00 PM, 29 October 2015, on Form 3, with the State Environmental Commission, 901 South Stewart Street, Suite 4001, Carson City, Nevada 89701-5249. For more information, contact Rob Kuczynski, P.E. at (775) 687-9441 or visit the Bureau of Mining Regulation and Reclamation website at <http://ndep.nv.gov/bmrr/index.htm>.

Written comments were received during the public comment period from 1) Mr. Greg Schoen, Regulatory Affairs Director, Round Mountain Gold Corporation, Round Mountain, Nevada (Letter dated 11 November 2013); and 2) Mr. George Benesch, Esq., Legal Counsel Representing Nye County, Nevada (Letter dated 12 November 2013).

The text of all comments, in some cases excerpted, and the Division responses (in *italics*) are included below as part of this Notice of Decision.

Mr. Schoen's Comments:

"...RMGC is the operator of the now inactive Manhattan Mine, which is in close proximity to the Goldwedge Project..." "...RMGC has a keen interest in the permit "Schedule of Compliance" item requiring the submittal of a comprehensive report detailing the impacts of continued dewatering of the Goldwedge Project and the Proponents plan for mitigation efforts".

“As a potentially impacted party, resulting from the reissuance of this permit, RMGC is looking forward to a continued dialog with you and your staff regarding this action”... “RMGC respectfully requests to be allowed to review the scope of work and to be allowed to review and provide input to the Hydrologic study prior to it being finalized”.

Division Response:

The Division understands the concerns of the potentially impacted parties within the Project area and is appreciative of the efforts undertaken by all parties in assisting the Division in its attempt to formulate a reasonable resolution. The Division will continue to work with all parties involved until a final resolution is obtained.

Mr. Benesch’s Comments:

“...[T]he proposed Goldwedge Project includes a dewatering component which calls for increases in dewatering pumping from 30 to 320 gpm [gallons per minute] to as much as 600 gpm from increased depths unspecified in the proposed permit.”

“[T]he community of Manhattan is limited to a single, limited capacity well [the Pipe Springs Well]...compliant with Federal drinking water standards...2,000 feet from the point of diversion of the dewatering component of the Goldwedge Project.”

“...[T]he County’s concerns center on the proposed dewatering...potentially adversely impacting the Pipe Springs Well.”...“A comprehensive hydrological study is underway to determine the impacts of future dewatering at Goldwedge on the ... [neighboring mine sites] and the water supply for the town of Manhattan.”

“A Schedule of Compliance (SOC) item requires that within 30 days after the completion of the hydrological study, the Permit[t]ee shall submit to the Division a comprehensive report highlighting the impacts of mine dewatering at the Project site on closed, current, and future operations at neighboring mine sites and the water supply and quality for the town of Manhattan. The report must include a mitigation plan and schedule for review and approval by the Division.”

“...[A]pproval of the subject Permit before this information is available is premature, precludes Nye County’s effective participation in the permitting process and greatly diminishes the County’s ability to protect its sole drinking water source.”...“[D]ocuments provided with the Notice of Proposed Action do not include sufficient information to evaluate potential impacts on the community’s Pipe Springs well and the comprehensive hydrological study needs to be made available before more meaningful comments, objections or requests can be provided.”

“...[T]he County...must object to renewal of the subject permit pending an appropriate evaluation of documents referenced above.”

“If your Bureau is inclined to reject this objection and issue the subject Permit and a suitable “middle ground” cannot otherwise be reached, please consider this correspondence as a request for a hearing pursuant to NAC Chapter 445A.”

Division Response:

The Schedule of Compliance item in question was completed prior to the Notice of Decision and this item has therefore been removed from the final version of Permit NEV2002107.

The purview of Permit NEV2002107 is the regulation of the fluid management system for the Goldwedge Mill, tailings, waste rock disposal, and pond facilities only. The Division does not regulate dewatering activities; the Division regulates the discharge of excess dewatering through the Goldwedge Rapid Infiltration Basins (RIBs). This item is of most concern to both commenters and is the purview of Permit NEV2008101 (Goldwedge Mining Project Rapid Infiltration Basins). This Permit is currently under technical review by the Division, and once completed, all affected parties will be afforded the opportunity to comment on the terms, conditions, and issuance of the Permit. The Division will continue to coordinate with the Permittee, the neighboring mining operations, Nye County, and the Nevada Division of Water Resources (NDWR).